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13 *Co-Lead Counsel for the Classes and*

14 *Attorneys for Individual and Representative Plaintiffs*

15 *Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez,*

16 *Brandon Vera, and Kyle Kingsbury*

17 [Additional counsel appear on signature page]

18 **UNITED STATES DISTRICT COURT**

19 **DISTRICT OF NEVADA**

20 Cung Le, Nathan Quarry, Jon Fitch, Brandon
21 Vera, Luis Javier Vazquez, and Kyle
22 Kingsbury on behalf of themselves and all
23 others similarly situated,

24 Plaintiffs,

25 vs.

26 Zuffa, LLC, d/b/a Ultimate Fighting
27 Championship and UFC,

28 Defendant.

Case No.: 2:15-cv-01045 RFB-(PAL)

**DECLARATION OF KEVIN E. RAYHILL
IN SUPPORT OF PLAINTIFFS'
MOTION TO CHALLENGE
ATTORNEY-CLIENT PRIVILEGE**

1 I, Kevin E. Rayhill, declare and state as follows:

2 1. I am an attorney at the Joseph Saveri Law Firm, Inc. (“JSLF”), Co-Lead Counsel for
3 the Classes and Attorneys for Individual and Representative Plaintiffs Cung Le, Nathan Quarry, Jon
4 Fitch, Luis Javier Vazquez, Brandon Vera, and Kyle Kingsbury in the above-captioned matter. I am a
5 member in good standing of the State Bar of California, and have been admitted to this Court *pro hac*
6 *vice*. I am over 18 years of age and have personal knowledge of the facts stated in this Declaration. If
7 called as a witness, I could and would testify competently to them.

8 2. I make this declaration in support of Plaintiffs’ Motion to Challenge Attorney-Client
9 Privilege with respect to twelve certain documents. Defendant produced the documents in the
10 course of discovery. On November 30, 2016, and December 5, 2016, Defendant sent Plaintiffs
11 letters claiming the documents were privileged attorney-client communications and purporting to
12 claw the documents back.

13 3. Attached hereto as Exhibit 1 is a publicly filed placeholder for the document with the
14 Bates stamp ZFL-0550804. This document will be lodged with the Court under seal.

15 4. Attached hereto as Exhibit 2 is a publicly filed placeholder for the document with the
16 Bates stamp ZFL-1014045. This document will be lodged with the Court under seal.

17 5. Attached hereto as Exhibit 3 is a publicly filed placeholder for the document with the
18 Bates stamp ZFL-1014047. This document will be lodged with the Court under seal.

19 6. Attached hereto as Exhibit 4 is a publicly filed placeholder for the document with the
20 Bates stamp ZFL-1014049. This document will be lodged with the Court under seal.

21 7. Attached hereto as Exhibit 5 is a publicly filed placeholder for the document with the
22 Bates stamp ZFL-1014072. This document will be lodged with the Court under seal.

23 8. Attached hereto as Exhibit 6 is a publicly filed placeholder for the document with the
24 Bates stamp ZFL-1014078. This document will be lodged with the Court under seal.

25 9. Attached hereto as Exhibit 7 is a publicly filed placeholder for the document with the
26 Bates stamp ZFL-1014102. This document will be lodged with the Court under seal.

27 10. Attached hereto as Exhibit 8 is a publicly filed placeholder for the document with the
28 Bates stamp ZFL-1014103. This document will be lodged with the Court under seal.

11. Attached hereto as Exhibit 9 is a publicly filed placeholder for the document with the Bates stamp ZFL-1845329. This document will be lodged with the Court under seal.

12. Attached hereto as Exhibit 10 is a publicly filed placeholder for the document with the Bates stamp ZFL-1845332. This document will be lodged with the Court under seal.

13. Attached hereto as Exhibit 11 is a publicly filed placeholder for the document with the Bates stamp ZFL-1845335. This document will be lodged with the Court under seal.

14. Attached hereto as Exhibit 12 is a publicly filed placeholder for the document with the Bates stamp ZEI-1845337. This document will be lodged with the Court under seal.

15. Attached hereto as Exhibit 13 is a true and correct copy of a letter sent to Plaintiffs' counsel by Zuffa's counsel Stacy Grigsby on November 30, 2016.

16. Attached hereto as Exhibit 14 is a true and correct copy of a letter sent to Zuffa's counsel by Plaintiffs' counsel Kevin Rayhill on December 2, 2016.

17. Attached hereto as Exhibit 15 is a true and correct copy of a letter sent to Plaintiffs' counsel by Zuffa's counsel Stacy Grigsby on December 5, 2016.

18. Attached hereto as Exhibit 16 is a true and correct copy of a letter sent to Zuffa's counsel by Plaintiffs' counsel Kevin Rayhill on December 8, 2016.

19. Attached hereto as Exhibit 17 is a publicly filed placeholder for the document with the Bates stamp ZEI-1014051. This document will be lodged with the Court under seal.

20. Attached hereto as Exhibit 18 is a true and correct copy of an email sent to Plaintiffs' counsel by Zuffa's counsel Stacey Grigsby on December 8, 2016.

21. Attached hereto as Exhibit 19 is a publicly filed placeholder for the redacted version document with the Bates stamp ZFL-1845329. This document will be lodged with the Court under seal.

I declare under penalty of perjury that the foregoing is true and correct and this Declaration is executed at San Francisco, California on December 15, 2016.

By: /s/ *Kevin E. Rayhill*
Kevin E. Rayhill

1 CERTIFICATE OF SERVICE

2 I hereby certify that on this 15th day of December, 2016 a true and correct copy of
3 **DECLARATION OF KEVIN E. RAYHILL IN SUPPORT OF PLAINTIFFS' MOTION TO**
4 **CHALLENGE ATTORNEY-CLIENT PRIVILEGE** was served via the United States District
5 Court CM/ECF system on all parties or persons requiring notice.

6 By: /s/ Kevin E. Rayhill
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